



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

September 27, 2018

New Avon LLC  
c/o Dr. Connie Welch  
toXcel  
7140 Heritage Village Plaza  
Gainesville, VA 20155

Subject: Label Amendment – adding claim for Powassan Encephalitis as a disease carried by ticks  
Product Name: Avon Skin So Soft SSS Bug Guard Plus Picardin Insecticide Repellent Towelettes  
EPA Registration Number: 806-30  
Application Date: 9/26/2017  
Decision Number: 534278

Dear Dr. Welch:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. “To distribute or sell” is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company’s website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product’s label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA’s Office of Enforcement and Compliance.

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Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. If you have any questions, please contact Autumn Metzger at 703-305-5314, or Metzger.autumn@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Elizabeth Fertich". The signature is fluid and cursive, with the first name being more prominent.

Elizabeth Fertich  
Product Manager 04  
Invertebrate & Vertebrate Branch 1  
Registration Division (7505P)  
Office of Pesticide Programs

Enclosure

FRONT OF CONTAINER:

AVON  
 SKIN-SO-SOFT  
 S  
 S  
 S  
 BUG GUARD PLUS  
 PICARIDIN  
 INSECT REPELLENT TOWELETTE(S)

**[ALTERNATE BRAND NAME #1:]**

AVON  
 SKIN-SO-SOFT  
 S  
 S  
 S  
 PICARIDIN  
 INSECT REPELLENT TOWELETTE(S)

**[ALTERNATE BRAND NAME#2:]**

AVON  
 BUG GUARD PLUS  
 PICARIDIN  
 INSECT REPELLENT TOWELETTE(S)

KEEP OUT OF REACH OF CHILDREN

CAUTION

See back panel for additional precautionary statements

## ACTIVE INGREDIENT:

Picaridin

10.0%

OTHER INGREDIENTS:

90.0%

TOTAL:

100.0%

1 TOWELETTE

Total Net Weight: 0.386 oz (10.94 g)

[8 TOWELETTES]

[Total Net Weight: 3.09 oz (87.52 g)]

[10 TOWELETTES]

[Total Net Weight: 3.86 oz (109.4 g)]

[25 TOWELETTES]

[Total Net Weight: 9.65 oz (273.5 g)]

**ACCEPTED**

09/27/2018

Under the Federal Insecticide, Fungicide  
 and Rodenticide Act as amended, for the  
 pesticide registered under  
 EPA Reg. No. 806-30

[Text within brackets is optional and may appear on the back of container label]

**BACK OF CONTAINER:**

**PRECAUTIONARY STATEMENTS:**

Hazards to Humans. CAUTION: Harmful if swallowed. Causes moderate eye irritation. Avoid contact with eyes. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Wash treated clothing before wearing again. Discontinue use and consult a doctor if irritation or rash occurs.

<b>FIRST AID</b>	
If in eyes:	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15 – 20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
If swallowed	<ul style="list-style-type: none"> <li>• Call a poison control center or doctor immediately for treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to by a poison control center or doctor.</li> <li>• Do not give anything to an unconscious person.</li> </ul>
<p>Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-FOR-AVON for emergency medical treatment information.</p>	

**PHYSICAL HAZARDS** - Flammable. Keep away from heat and open flame.

[ALERT: To avoid danger of suffocation, keep this and all other plastic bags away from babies and children. Do not use in cribs, beds, carriages or playpens. The thin film may cling to nose and mouth and prevent breathing.]

**DIRECTIONS FOR USE:**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Read and follow all directions and precautions on this product label. Open package, remove and unfold towelette. Use as many towelettes as necessary to ensure even and liberal coverage before insect exposure. Adults may need to use more than one towelette. Do not apply near eyes and mouth. Apply sparingly around ears. Do not apply under clothing, on cuts, wounds, freshly shaved, excessively sunburned or irritated skin. Use just enough repellent to cover exposed skin. Avoid over application of product. Do not allow children to handle this product. Do not apply directly to children's hands. FOR CONTINUED PROTECTION from deer ticks reapply after 12 hours, and for mosquitoes reapply after 8 hours, and for gnats, no-seeums, sand flies and biting midges reapply after 6 hours. Do not exceed 2 applications per day.

**STORAGE AND DISPOSAL:**

PESTICIDE STORAGE: Store in cool, dry place away from heat or flame. PESTICIDE DISPOSAL & CONTAINER HANDLING: **If empty:** Nonrefillable container. Do not reuse or refill this container. Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

To order, see an Avon Representative, or call 1-800-FOR-AVON. [www.avon.com](http://www.avon.com)

EPA Reg. No. 806-30

EPA Est. No. [052631-NJ-001[AP], 052631-NJ-001, 74058-CA-001[IO], 74058-CA-001,

806-OH-001]

[Boxed letters are first letters of lot number]

[Distributed by] NEW AVON LLC

1251 AVE. OF THE AMERICAS, NY, NY 10020

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Day Lot Code

Exp. Year / Month

**[Note to reviewer: The following statements, including those within brackets, are optional AND may appear on the product label AND / OR in marketing collateral materials AND the use of punctuation marks for each statement is optional]**

Contains Vitamin E

With Vitamin E

Vitamin E

Contains Aloe

With Aloe

Aloe

Contains Vitamin E & Aloe

(Contains) Bayrepel®

Bayrepel® is a registered trademark of Lanxess

U.S. Patent No. 6,719,959 and 7,150,878

Gentle Breeze™ Scent

Gentle Breeze™

Pleasantly scented

Easy to apply

Wipe on protection

Convenient [towelette] [wipe] for easy application

Convenient [towelettes] [wipes] for easy application

Portable protection

(Towelettes) (Wipes) will not dry out

Non-oily

Not oily

Non-greasy

Not Greasy

Light feel

Quick drying

Fast drying

Will not harm most plastics or synthetic fabrics

May damage painted or varnished surfaces, including nail polish

For active [family] lifestyles

Protection from mosquitoes

Protection from deer ticks

Protection from mosquitoes and deer ticks

Suitable for the [entire] [whole] family

Provides the whole family with an effective [broad-spectrum] outdoor insect repellent

Protection for the [entire] [whole] family

Strong protection for the [entire] [whole] family

[Strong] [Dependable] Protection

Effective, dependable protection

Provides strong and dependable [protection] [repellency]

[Repellency -] Avon's exclusive formula [with Picaridin] provides strong and dependable [repellency] [protection] against deer ticks, mosquitoes, gnats, no-seeums, sand flies and biting midges

[Repellency -] Patented technology that provides strong and dependable [repellency] [protection] against deer ticks, mosquitoes, gnats, no-seeums, sand flies and biting midges

Patented technology

Patented enhanced duration technology

Patented time-release technology

Patented time-release technology

Time-release formula

Time-release

Patented controlled-release technology

Controlled-release formula

Controlled-release

Repels [listed insects] [mosquitoes for up to 8 hours] [deer ticks for up to 12 hours]  
[mosquitoes for up to 8 hours and deer ticks for up to 12 hours] [gnats, no-seeums, sand flies  
and biting midges for up to 6 hours]

Strong and long-lasting [repellency] [protection] against mosquitoes [for] [up to] 8 hours

Strong and long-lasting [repellency] [protection] against deer ticks [for] [up to] 12 hours

Strong and long-lasting [repellency] [protection] against mosquitoes [for] [up to] 8 hours and  
deer ticks [for] [up to] 12 hours

Strong [repellency] [protection] against deer ticks for up to 12 hours, mosquitoes for up to 8  
hours, and gnats, no-seeums, sand flies and biting midges for up to 6 hours

[Repellency] [Protection] against deer ticks, mosquitoes, gnats, no-seeums, sand flies and  
biting midges

Strong [repellency] [protection] against deer ticks, mosquitoes, gnats, no-seeums, sand flies  
and biting midges

Repels gnats, no-seeums, sand flies and biting midges

Repels gnats, no-seeums, sand flies and biting midges up to 6 hours

Repels gnats, no-seeums, sand flies and biting midges for 6 hours

Strong [repellency] [protection] against mosquitoes

[Repellency] [protection] against mosquitoes

Prevents mosquitoes from biting [for 8 hours]

Strong [repellency] [protection] against deer ticks

[Repellency] [protection] against deer ticks

Strong [repellency] [protection] against mosquitoes and deer ticks

Repels mosquitoes

Repels mosquitoes up to 8 hours

Repels mosquitoes for 8 hours

Repels mosquitoes that may carry/transmit West Nile Virus up to 8 hours

Repels mosquitoes that may carry/transmit West Nile Virus for 8 hours

Repels mosquitoes that may carry/transmit West Nile Virus

Repels deer ticks

Repels deer ticks up to 12 hours

Repels deer ticks for 12 hours

Repels deer ticks that may carry/transmit [Lyme Disease] [and] [Powassan Encephalitis] up to 12 hours

Repels deer ticks that may carry/transmit [Lyme Disease] [and] [Powassan Encephalitis] for 12 hours

Repels deer ticks that may carry/transmit [Lyme Disease] [and] [Powassan Encephalitis]

Made in the USA

Low odor formula

Handy to carry with you

On the go protection

Won't get in your eyes like sprays can

Always fresh

Wipe it on, toss it out

Protection on the go

Effective, dependable insect repellency

Non-sticky

Easy, simple application

Protection for the entire family

Smart (dependable) protection for the entire family

Effective protection you can count on from listed insects (including mosquitos and deer ticks)

Shield against mosquitos and deer ticks

Fights off mosquitos and unwanted listed insects

Easy on skin, tough on listed bugs

The right protection for your family

Stay protected for 8 hours from mosquitos and for 12 hours from deer ticks

For hiking, fishing, hunting, camping and backpacking

Suitable for outdoor activities

Perfect for hiking and other outdoor sports